

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

UNITE HERE HEALTH, <i>et al.</i> ,	)	
	)	
Plaintiffs,	)	
	)	
vs.	)	CIVIL ACTION
	)	
JSK PARSIPPANY, LLC, a foreign limited liability	)	NO. 23 C 2841
company, d/b/a FAIRFIELD INN & SUITES	)	
BY MARRIOTT, PARSIPPANY,	)	JUDGE MARY M. ROWLAND
	)	
Defendant.	)	

**MOTION FOR ENTRY OF JUDGMENT**

Plaintiffs, by and through their attorneys, default having been entered against the Defendant on August 29, 2023 [Dkt. 13], request this Court enter judgment against Defendant, JSK PARSIPPANY, LLC, a foreign limited liability company, d/b/a FAIRFIELD INN & SUITES BY MARRIOTT, PARSIPPANY, pursuant to F.R.Civ.P. Rule 55(b). In support of this Motion, Plaintiffs state:

1. On August 29, 2023, this Court entered default against Defendant and granted Plaintiffs' request for an order directing an audit of the Defendant's payroll books and records. The Court also entered an order that judgment would be entered after the completion of the audit.
2. On or about February 14, 2024, Plaintiffs' auditors issued a preliminary audit report and on or about March 19, 2024, a final audit report was issued. The audit findings show that the Defendant is delinquent in contributions to the Funds in the amount of \$77,878.96, plus \$15,575.80 for liquidated damages and \$1,779.04 for interest calculated through March 31, 2024. (See Affidavit of Terry Funk ¶ 6 and Affidavit of Dean Dailey ¶ 5).

3. Plaintiffs' auditor, Terry Funk, charged Plaintiffs \$2,996.23 to perform the audit examination and complete the report and the Fund is entitled to recover said fees under their Trust Agreement (Funk Aff. ¶ 6 and Dailey Aff. ¶ 7).

4. In addition, Plaintiffs' firm has expended \$842.97 for costs and \$7,100.00 for attorneys' fees in this matter. (See Affidavit of Laura M. Finnegan).

5. Based upon the documents attached hereto, Plaintiffs request entry of judgment in the total amount of \$106,173.00.

WHEREFORE, Plaintiffs respectfully request this Court to enter judgment in the amount of \$106,173.00.

/s/ Laura M. Finnegan

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**CERTIFICATE OF SERVICE**

The undersigned, an attorney of record, hereby certifies that on or before the hour of 5:00 p.m. this 11th day of April 2024, she electronically filed the foregoing document (Motion for Entry of Judgment) with the Clerk of Court using the CM/ECF system, which will send notification to the following CM/ECF participant:

James C. Vlahakis  
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A copy of the Motion for Entry of Judgment will also be electronically mailed to the following non-CM/ECF participant:

Anthony Mahajan  
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/s/ Laura M. Finnegan

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